

By First-Class Mail

May 30, 2012

United States District Court  
for the Southern District of California  
940 Front Street, Courtroom 10  
San Diego, California 92101-8900

John J. Stoia, Jr.,  
Robbins Geller Rudman & Dowd LLP  
655 West Broadway, Suite 1900  
San Diego, CA 92101.

Shirli F. Weiss  
DLA Piper LLP (US)  
401 B Street, Suite 1700  
San Diego, CA 92101

RE: *In Re Groupon Marketing and Sales Practices Litigation*, MDL No. 2238

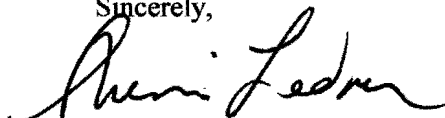
To the U.S. District Court, Mr. Stoia and Ms. Weiss:

Please accept this as an objection to the settlement of the above-referenced class action. I am a purchaser of Groupon vouchers during the period covered that have expired and have not been redeemed (copies are enclosed). Currently, Groupon's policy is that I may use the amount paid for those vouchers toward a purchase at the merchant, even though the vouchers have expired. Groupon's web site provides as follows as to each voucher: "This Groupon voucher's promotional value has expired, but this voucher is now, and will always be, redeemable for \$[amount paid] at [specific merchant]. All other voucher terms continue to apply." Each voucher also says that the amount paid "never expires."

I contacted Rust Consulting's phone line for class members and was told that other than getting a voucher for the value paid for the Groupon voucher to use at the same merchant, there is no other proposed settlement benefit. A review of the relevant paperwork and web site did not show further benefit. So, I do not understand how sending in a claim form benefits the class members, like me. I understand that Groupon has modified its practices, that the class counsel and consultant will receive fees and that there may be charitable donations, but since Groupon already offers that merchants will honor the value of the Groupon vouchers purchased, there seems to be no value in filing a claim. If anything, the class members who file a claim will receive a diminished benefit, since vouchers sent to them will only be good for 130 days, while current Groupon policy is that vouchers' value does not expire.

I do not intend to appear at the Final Approval Hearing. Thank you for reading my comments.

Sincerely,



Sherri Ledner  
14001 Marian Drive  
Rockville, MD 20850  
301-738-9904 phone  
sherriledner@gmail.com

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**GROUPON****Smithsonian IMAX Theaters**

Good for 1 IMAX Theater (p. \$8 retail)

The amount paid for this voucher (\$4) with Smithsonian IMAX Theaters NEVER EXPIRES.  
The promotional value expires February 29, 2012.

**The Fine Print**

Limit 3/person, may buy 3 add'l as gifts. **This voucher is only redeemable for a ticket to a specific ticketed event and venue and has no value after February 29, 2012.** Must redeem in person between 11/10/2011-2/29/2012. Not valid 11/24/11-11/27/11 and 12/26/11-01/01/12. May not be used for previous purchases. Tickets are subject to availability. No cash value.

**Redeem at**

National Museum of Natural History - Samuel C. Johnson IMAX Theater 10th St. and Constitution Ave. NW Washington DC 20560	National Air and Space Museum - Lockheed Martin IMAX Theater 6th St. and Independence Ave. SW Washington DC 20560
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1 more location

**Rules**

These are the restrictions that apply to every Groupon voucher (unless the Fine Print specifies an exception)

**Value of the Groupon Voucher**

This voucher has two separate values: (a) the amount paid; and (b) the promotional value. The amount paid will never expire and may be applied toward any goods or services offered by the merchant if the promotion is no longer available. The promotional value is the additional value beyond the amount paid, and it will expire on the expiration date above (unless prohibited by law).

**Redemption and Refund**

Redeemable only at Smithsonian IMAX Theaters for the goods or services listed above. If the merchant refuses to honor this voucher because the promotional value has expired or for any other reason, Groupon will refund the amount paid. Period.

**How to Use This**

1. Pull up Groupon with our mobile app (or print it out).
2. Present Groupon at any Smithsonian IMAX Theater box office.
3. Enjoy!

Please note that this Groupon is valid for different movies at different locations:

\*Samuel C. Johnson IMAX Theater: "Tornado Alley", "Grand Canyon Adventure 3D: River at Risk" (closes January 19, 2012), and "Coral Reef Adventure" (opens January 20, 2012)

\*Lockheed Martin IMAX Theater: "Legends of Flight" and "To Fly!"

\*Airbus IMAX Theater: "Legends of Flight" and "Fighter Pilot"

Not redeemable for cash (unless required by law). Doesn't cover tax or gratuity. Promotional value can't be combined with other offers. Not reloadable. Unauthorized reproduction, resale, modification, or trade prohibited. Smithsonian IMAX Theaters is the issuer of this voucher. Purchase, use, or acceptance of this voucher constitutes acceptance of these terms. This voucher is transferable. For more information, visit <http://www.groupon.com/terms>.

**GROUPON****Smithsonian IMAX Theaters**

Get a free IMAX movie ticket for \$4

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**GROUPON****Smithsonian IMAX Theaters**

Good for 1 IMAX Movie Ticket (up to \$8 value)

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## Smithsonian IMAX Theaters

Good for 1 "3D" or "4D" Ticket in \$8 value

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2011-9718



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**GROUPON**

## Madame Tussauds Washington D.C.

Good for 1 General Admission Ticket (a \$12.95 value)

The amount paid for this voucher (\$11) with Madame Tussauds Washington D.C. NEVER EXPIRES.  
The promotional value expires January 28, 2012.



### The Fine Print

Limit 6 per person. Valid only at Washington, D.C. location.

### Redeem at

Penn Quarter  
1001 F St. NW  
Washington DC 20004

866-823-9565

### How to Use This

1. Pull up Groupon with our mobile app (or print it out).
2. Present Groupon upon arrival.
3. Enjoy!

### Rules

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